

5.1.4 Establishing Clear Roles, Responsibilities, and Authorities

Issue

The Department's process for delegating authority from Headquarters to the DOE Field Offices for safety responsibilities must be more clearly defined.

Basis

Departmental assignments of safety responsibilities are captured in the Department's FRAM, for which EH is the OPI. Assigned headquarters officials may delegate authority to subordinate field personnel to implement these assignments, but may not delegate their responsibilities for ensuring safety. Recent Department decisions have decentralized many responsibilities from Headquarters to field offices. While decentralization is useful in improving productivity and moving decision-making closer to the work, sometimes delegations of authority have been made using inconsistent standards and without verifying individual and organizational capabilities to carry out the responsibilities. To have confidence that safety responsibilities are properly performed, the Department must more clearly establish processes and criteria for delegations of authority. After delegations of authority are made, the delegations must be periodically reviewed to ensure that the individuals and organizations maintain the necessary capability and capacity on which the delegation was made.

Resolution Approach

For each identified safety responsibility, the Department will determine whether authority to fulfill these responsibilities can be delegated from Headquarters to the DOE Field Offices. The Department's FRAM captures those instances where delegations of authority are not allowed. For each safety responsibility for which authorities can be delegated to the field offices, the following criteria need to be evaluated and deemed acceptable:

- Qualifications, experience, and expertise expected in the position receiving the delegation.
- Qualifications, experience, and expertise of the organization receiving the delegation.
- Proper framework of processes and procedures to implement the delegated authorities.
- Sufficient resources.
- Periodic re-verification of capability and capacity and demonstrated performance.
- Compensatory measures implemented, if needed.

The Department will clearly define the process and criteria for making these delegations of authority. This will include: (1) review and verification of qualifications, experience, and expertise of the primary recipient of the delegation; (2) review and verification of qualifications, experience, and expertise of the staff of the primary recipient of the delegation; (3) review of the processes and procedures in place in the organization of the primary recipient of the delegation; (4) review and verification of adequate resources, both technically qualified staff and sufficient funding; (5) bi-annual (every 2 years) re-verification for all delegations; and (6) definition of compensatory measures as needed.

The rigor and formality of the delegation of authority process may vary based on the risk associated with the assigned responsibilities. Nuclear safety responsibilities, such as safety basis processes and start-up approvals, would require the highest standard of assurance. The Department will define and list the core nuclear safety delegations that require additional rigor in delegation, and clearly define additional process steps or criteria.

Implementation of the process for all field delegations will complete the actions needed to lift the existing restrictions on new safety delegations, established by the Secretary on July 21, 2004.

Beyond the scope of the Board's recommendation and the Secretary's acceptance, the Department recognizes that close attention to delegations of authority to field personnel needs to be balanced with appropriate attention to assignments of responsibilities to headquarters personnel. As such, the Department will also define a process for a documented bi-annual self-assessment for each program office to review the assignment of safety management roles and responsibilities within the program office. This will include: (1) review and verification of qualifications, experience, and expertise of the primary recipient of the delegation; (2) review and verification of qualifications, experience, and expertise of the staff of the primary recipient of the delegation; (3) review of the processes and procedures in place in the organization of the primary recipient of the delegation; (4) review and verification of adequate resources, both technically qualified staff and sufficient funding; (5) bi-annual (every 2 years) re-verification for all assignments; and (6) definition of compensatory measures as needed.

Pursuant to DOE Order 414.1C, headquarters organizations will establish Quality Assurance Programs (QAPs), which will describe quality assurance roles and responsibilities, how these organizations ensure the quality of the delegation of authority process and criteria, and how the quality assurance criteria are met.

The process and criteria for delegations will ultimately be added to the Department's Functions, Responsibilities and Authorities Manual (FRAM). Line organizations will be expected to verify delegations bi-annually (every 2 years) and to issue any new field delegations in accordance with the established process. The responsibility for satisfying this process will be with the office directors, who will need to devote sufficient staff and resources to sustain the process once established.

The Department's FRAM, maintained by EH, is periodically revised, per the following requirement: "Responsibilities: Update DOE M 411.1-1 every six months (DOE Manual 411.1-1C, *Safety Management Functions, Responsibilities, and Authorities Manual*, Table 7, Functions, Responsibilities and Authorities for the Assistant Secretary for Environment, Safety and Health, page 52)." The DOE headquarters program office and field element Functions, Responsibilities and Authorities (FRA) documents, are also reviewed periodically, on an annual basis, in a flow-down sequence, when possible, and revised as necessary. As various responsibilities described in this plan are implemented, the Department plans to make appropriate changes in the DOE FRAM, the headquarters program office FRA documents (such as the NNSA FRA document) and the field element FRA documents, in accordance with the normal schedules for updates. Oversight of all

assigned safety responsibilities, regardless of delegations, will be conducted in accordance with the process described in Section 5.1.2.

Deliverables/Milestones

Commitment 9: Define and implement the process and criteria for delegating authorities to field personnel for fulfilling assigned safety responsibilities, and for performing periodic self-assessments on assignment of responsibilities and authorities to headquarters personnel.

Lead Responsibility A & C: NA-1; US-ESE

Deliverable A: Process definition and criteria, approved by the Deputy Secretary

Due Date A: September 2005

Lead Responsibility B: CTAs

Deliverable B: Report to the Secretary on review activities to evaluate implementation of the processes and criteria for delegating authorities to field personnel for fulfilling safety responsibilities, and to determine whether all existing delegations of authority to the DOE Field Offices have been and are being made using these new processes and criteria.

Due Date B: February 2006

Deliverable C: Approved biennial program office self-assessments of safety function assignment at the program office level.

Due Date C: Twelve months after issuance of the process and criteria definition for HQ responsibilities self-assessment, per Commitment 9A.
[September 2006]

Commitment 10: Develop and implement QAPs as required by DOE O 414.1C, “Quality Assurance.”

Lead Responsibility: NA-1, US-ESE and EH

Deliverable A: Approved HQ program office QAPs, with approved paths forward and schedules for achieving full implementation, including revision and implementation of field element QAPs.

Due Date A: November 2005

Deliverable B: Approved Field Element QAPs.

Due Date B: Completion in accordance with schedules provided in Commitment 10A.

Integration with ISM system

This topic is clearly focused on improving consistency and completeness of implementation of ISM Guiding Principle #3 – Competence Commensurate with Responsibility. This principle permeates the performance of all ISM core functions at all levels.